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## STATE OF COLORADO

Roy Romer, Governor Patricia A. Nolan, MD, MPH, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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July 26, 1994

Mr. Mark A. Silverman Manager, Rocky Flats Office U.S. Department of Energy P.O. Box 928 Golden, Colorado 80402-0928 Certified Mail ZO18 698 407 Return Reciept Requested

RE: 750 Pad Sludge Characterization for 207 C-Pond and the Clarifier (RCRA Unit 25)

Dear Mr. Silverman:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed the Department of Energy's (DOE) Waste Analysis Plan, dated July 14, 1994, that describes sampling the contents of the hazardous waste tanks on the 750 Pad for only specific gravity. The Division also received a letter by Jessie Roberson, Acting Assistant Manager for Environmental Restoration (DOE-ER), dated May 25, 1994, that proposes no further characterization other than specific gravity measurements for the pond sludge to be placed in the tanks. The Division does not agree with this assessment.

Our letter dated May 9, 1994 gives Rocky Flats Environmental Technology Site (RFETS) conditional approval for a change to Interim Status Tank storage on the 750 Pad (RCRA Unit 25) for the 207 C-Pond and the Clarifier. The only condition required prior to sludge transfer was the Professional Engineer Certification for the tanks to be used for sludge storage. There is no reason why the transfer of sludge from the Solar Ponds into the 750 Pad tanks can not continue.

On March 31, 1994 a spill occurred from one of the 750 pad tanks during a transfer of decant liquid from the tank to a tanker truck. The pH of the spill was measured by the facility to be 13. The Haliburton Report describes mean pH results of 7.6-7.7, 8.3-8.5, and 5.7-5.9 from Pond 207B North, while B-Pond South had pH results of 9, and 9.1, 5.4-5.9. The spilled waste was from the B Pond sludge. The data demonstrates an inconsistency in waste characterization procedures for the pond sludges.

**ADMIN RECCRD** 

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The waste analysis plan submitted indicates the fingerprinting (abbreviated waste analysis) only includes specific gravity. The Division agrees with the specific gravity sampling, but also requests some additional sampling. Since the spill of B-Pond material had a pH orders of magnitude greater than the Haliburton pH results for the B-Pond material, the Division requests pH sampling be included in the fingerprint analysis. In order to address spill responce and health and safety concerns, the Division is also requesting Gross Alpha, Beta, and Gamma analysis to be preformed on a representative number of tanks. At least 10% of the tanks should be included in the analysis. The parameters listed above meet the minimum requirements for the waste analysis plan specific to this unit that is adequate to ensure safe storage of the sludge. Additional information will be required in order to comply with 6 CCR 1007-3, Part 268, LDR regulations.

Additionally, the Division is requiring that the permit Modification request #12 dated October 1992 for container storage on the 750 pad be formally withdrawn, since it is not applicable. A new permit application that addresses tank storage, in the form of a class 2 permit modification, must be submitted for the 750 Pad tanks. The permit modification must be submitted no later than 180 days of the date that you receive this letter in accordance with 6 CCR 1007-3, Section 100.11(b).

If you have any questions concerning this matter, please contact either Chris Gilbreath at (303) 692-3371 or Lisa Weers at (303) 692-3451.

Sincerely,

Gary W. Baughman, Chief

Facilities Section

Hazardous Waste Control Program

cc: S. Tarlton, Rocky Flats Program Unit

M. Johnson, Jefferson County Health Department

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